

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

YIATIN CHU; CHINESE AMERICAN
CITIZENS ALLIANCE OF GREATER
NEW YORK; INCLUSIVE EDUCATION
ADVOCACY GROUP; and HIGHER WITH
OUR PARENT ENGAGEMENT,

Plaintiffs,

v.

BETTY A. ROSA, in her official capacity as
Commissioner of Education for the State of
New York,

Defendant.

No. _____

DECLARATION OF YI FANG CHEN

I, Yi Fang Chen, declare as follows:

1. The facts set forth in this declaration are based on my knowledge and, if called as a witness, I can competently testify to truthfulness under oath. As to those matters that reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.

2. I am an Asian-American resident of New York State.

3. I am a member of Higher with Our Parent Engagement.

4. My child, M.P., is Asian American and a resident of New York State.

5. M.P. is enrolled in 6th grade, is in good academic standing, has an overall GPA above 80, and a GPA above 80 in math and science.

6. M.P. is interested in applying for admission to the Science and Technology Entry Program (STEP) session at New York University for fall 2024.

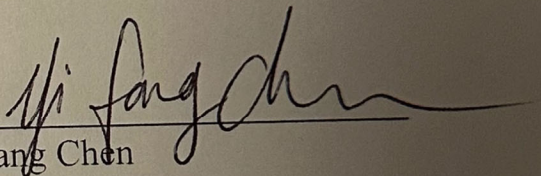
7. Because M.P. is Asian American, he must satisfy a family income threshold to be eligible to apply for this program.

8. It is my understanding that if M.P. was not Asian American, but instead was black, Hispanic, Native American, or Alaskan Native, then M.P. would be eligible to apply regardless of our family's income.

9. I believe that the STEP student eligibility requirements discriminate against Asian-American applicants like M.P. because of his race.

* * *

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 16th day of January, 2024, at New York, New York.


Yi Fang Chen